

**UNITED STATES BANKRUPTCY COURT**  
**MIDDLE DISTRICT OF PENNSYLVANIA**

In re: Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

Larry D. Smith, Jr.  
a/k/a Larry D. Smith  
**Debtor 1**

First Investors Servicing Corp.  
**Movant(s)**

v.

Larry D. Smith, Jr.  
a/k/a Larry D. Smith

**Respondent(s)**

Charles J. DeHart, III, Esquire  
Standing Chapter 13 Trustee  
**Additional Respondent**

**Chapter 13**

**Case No.** 1:20-BK-01221-HWV

**Matter:** Motion for Relief from the Automatic Stay

**Document No.** 22

**DEBTOR(S)' ANSWER TO MOVANT(S)' MOTION  
FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW, come the Debtor(s), Larry D. Smith, Jr., through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay and aver as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted. Debtor(s) stand ready to bring their account current per stipulation terms agreeable to the parties.
5. Admitted. Debtor(s) stand ready to bring their account current per stipulation terms agreeable to the parties.

WHEREFORE, Debtor(s) requests this Court deny the requested relief.

Respectfully submitted,  
**DETHLEFS PYKOSH & MURPHY**

Dated: September 19, 2020

/s/ Paul D. Murphy-Ahles

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Paul D. Murphy-Ahles, Esquire  
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Camp Hill, PA 17011  
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Attorney for Debtor(s)

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**CERTIFICATE OF SERVICE**

I hereby certify that on Saturday, September 19, 2020, I served a true and correct copy of the **Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay** in this proceeding via electronic means upon the following:

William Craig, Esquire  
Morton & Craig, LLC  
110 Marter Avenue, Suite 301  
Moroestown, NJ 08057  
*Counsel for Movant(s)*

Charles J. DeHart, III, Esquire  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036

Office of the United States Trustee  
Ronald Reagan Federal Building  
228 Walnut Street, Room 1190  
Harrisburg, PA 17101

/s/ Kathryn S. Greene

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Kathryn S. Greene, Pa.C.P., Paralegal for  
Paul D. Murphy-Ahles, Esquire